

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

JANE DOE 1, *et al.*

§

Plaintiffs,

§

v.  
Baylor University,

§

Defendant.

§  
§  
§  
§

Civil Action No. 6:16-CV-00173-RP

*Consolidated with*  
6:17-CV-228-RP  
6:17-CV-236-RP

**DEFENDANT BAYLOR UNIVERSITY'S ADVISORY TO THE COURT  
REGARDING DOCKET NO. 1090**

TO THE HONORABLE ROBERT PITMAN:

Defendant Baylor University advises the Court that Baylor has completed the production of the entire Pepper Hamilton universe of documents pursuant to the Report and Recommendation of Special Master (“Report and Recommendation”), the Court’s order adopting the Report and Recommendation, and the Court’s text order of March 7, 2023, extending the deadline for production to April 1, 2023. Dkt. 1082 at 19-31; Dkt. 1090 at 5; Dkt. 1091. The production was transmitted electronically to Plaintiffs’ counsel on March 31, 2023. *See* Exh. A, Declaration of Ryan H. Newman (“Newman Decl.”) at ¶ 4. The production contains 1,326,747 documents bearing either a “PH” or “PH2” bates label. Exh. B, Declaration of Todd Ranta. In accordance with the Report and Recommendation and the Court’s Order (*see* Dkt. 1082 at 33 and Dkt. 1090 at 5), Baylor attaches declarations from its counsel and its electronic discovery vendor describing the steps taken to ensure a complete and proper production. *See* Exh. A, Newman Decl.; Exh. B, Declaration of Todd Ranta.

Finally, although Baylor has worked diligently to comply with the Court’s orders and has engaged in quality control processes, due to the large volume of production and the use of zipped and compressed files, there is the remote possibility of the occurrence of a technical issue during the

zipping, compressing, or transmittal of the production. If Plaintiffs' counsel identifies a technical issue with a document or a gap in metadata, Baylor will immediately address any unexpected technical issues.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served upon all counsel of record on March 31, 2023, via ECF/CMF electronic service system:

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